

**GUTRIDE SAFIER LLP**

ADAM J. GUTRIDE (State Bar No. 181446)  
SETH A. SAFIER (State Bar No. 197427)  
MARIE MCCRARY (State Bar No. 262670)  
KRISTEN G. SIMPLICIO (State Bar No. 263291)  
100 Pine Street, Suite 1250  
San Francisco, California 94111  
Telephone: (415) 639-9090  
Facsimile: (415) 449-6469

Attorneys for Plaintiff, ROHINI KUMAR

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ROHINI KUMAR, an individual, on behalf of  
herself, the general public and those similarly  
situated,

Plaintiff,

vs.

SALOV NORTH AMERICA CORP.

Defendant.

Case No. 4:14-CV-02411 YGR

**JOINT STIPULATION TO ALLOW  
FILING OF AMENDED COMPLAINT  
AND [PROPOSED] ORDER**

Assigned to Hon. Yvonne Gonzalez Rogers

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2 Plaintiff Rohini Kumar (“Plaintiff”) and Defendant Salov North America Corp. (“SNA” or  
3 “Defendant”) hereby stipulate as follows:

4 **WHEREAS**, on December 30, 2016 the parties entered into a proposed Settlement  
5 Agreement (Dkt. 140-1 at Ex. 1) (“Settlement Agreement”), which calls for the filing of an  
6 amended complaint asserting nationwide claims consistent with the proposed nationwide settlement  
7 class contemplated by the Settlement Agreement;

8 **WHEREAS**, capitalized terms herein have the same meanings set forth in the Settlement  
9 Agreement;

10 **WHEREAS**, Plaintiff has proposed filing the attached amended complaint to accomplish  
11 such goals;

12 **WHEREAS**, pursuant to the Settlement Agreement, SNA is not required to file an answer  
13 or otherwise respond to the Amended Complaint (Dkt. 140-1 at Ex. 1, §7.1); and

14 **WHEREAS**, pursuant to the Settlement Agreement, in the event that Preliminary Approval  
15 is denied, Final Approval is denied, or a remitter is issued reversing an award of Final Approval, or  
16 the Settlement Agreement otherwise is terminated, the attached Amended Complaint will be  
17 deemed withdrawn (Dkt. 140-1 at Ex. 1, §7.1) and Plaintiff shall file a similar amended complaint  
18 alleging claims under California law on behalf of “All natural persons in California who purchased  
19 liquid Filippo Berio brand olive oil of any grade except ‘Organic’ between May 23, 2010 and June  
20 30, 2015, except for purposes of resale”;

21 **NOW, THEREFORE, IT IS STIPULATED**, by and between the undersigned parties,  
22 through their respective counsel of record, that, pursuant to Rules 15(a)(2) and 16 of the Rules of  
23 Civil Procedure, upon entry of an order granting Preliminary Approval, Plaintiff be allowed to file  
24 the attached Amended Complaint and that SNA be relieved of any obligation to respond to the  
25 Amended Complaint.  
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1 Dated: January 17, 2017

GUTRIDE SAFIER LLP  
Seth A. Safier  
Marie McCrary  
Kristen G. Simplicio

2  
3 By: /s/ Kristen Simplicio

4 Kristen Simplicio  
5 Attorneys for Plaintiff  
ROHINI KUMAR

6 Dated: January 17, 2017

7 SIDLEY AUSTIN LLP  
Mark E. Haddad  
8 Sean A. Commons  
Nitin Reddy  
9 Collin P. Wedel

10 By: /s/ Nitin Reddy  
Nitin Reddy

11 Attorneys for Defendant  
12 SALOV NORTH AMERICA CORP.

13 \* Filer attests that all signatories listed, and on whose behalf the filing is submitted, concur in the  
14 filing's content and have authorized the filing.

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**[PROPOSED] ORDER**

Pursuant to Rules 15(a)(2) and 16 of the Rules of Civil Procedure, and the Court's inherent authority to manage its docket, and **GOOD CAUSE APPEARING THEREFOR,**

**IT IS SO ORDERED.**

DATED:

\_\_\_\_\_  
THE HONORABLE YVONNE GONZALES ROGERS  
UNITED STATES DISTRICT JUDGE